

1 NICHOLAS M. WAJDA (State Bar #259178)  
2 Attorney Email Address: nick@wajdalawgroup.com  
3 WAJDA LAW GROUP, APC  
4 6167 Bristol Parkway  
5 Suite 200  
6 Culver City, California 90230  
Telephone: (310) 997-0471  
Facsimile: (866) 286-8433  
*Attorney for Plaintiff*

7 **UNITED STATES DISTRICT COURT**  
8 **NORTHERN DISTRICT OF CALIFORNIA**

10 PAUL A. REED, individually and on  
11 behalf of all others similarly situated,

12 Plaintiff,

13 v.

14 MIDLAND CREDIT MANAGEMENT,  
15 INC.,

16 Defendant.

Case No. 5:19-cv-05846-BLF

**NOTICE OF VOLUNTARY DISMISSAL  
WITHOUT PREJUDICE**

17 NOW COMES Paul A. Reed (“Plaintiff”), through the undersigned counsel, and in support  
18 of his Notice of Voluntary Dismissal Without Prejudice, states as follows:

19 Plaintiff, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure,  
20 hereby gives notice that this action is voluntarily dismissed without prejudice against the  
21 Defendant, Midland Credit Management, Inc. This notice of dismissal is being filed with the Court  
22 before service by Defendant of either an answer or a motion for summary judgment. Plaintiff  
23 anticipates filing a notice of voluntary dismissal within 45 days and respectfully requests that this  
24 Court suspend or vacate all deadlines in anticipation of the complete dismissal of this case.  
25

26 Dated: October 21, 2019

27 Respectfully submitted,

28 By: /s/ Nicholas M. Wajda

1 Nicholas M. Wajda, Esq.  
2 WAJDA LAW GROUP, APC  
3 6167 Bristol Parkway, Suite 200  
4 Culver City, California 90230  
5 Telephone: (310) 997-0471  
6 Facsimile: (866) 286-8433  
7 Email: [nick@wajdalawgroup.com](mailto:nick@wajdalawgroup.com)

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28